

Exhibit B

From: Hemlock, Adam [<mailto:adam.hemlock@weil.com>]

Sent: Thursday, March 24, 2016 10:43 PM

To: Kass, Colin

Cc: Steven.Cherry@wilmerhale.com; Patrick.Carome@wilmerhale.com; Reiss, Steven; Trager, Lara; hiwrey@dykema.com; klein@butzel.com; Steve Williams; Ronnie Spiegel; Jon Cuneo; Vicky@cuneolaw.com; WShotzbarger@duanemorris.com

Subject: OEM Subpoena - 30(b)(6) topics

Dear Colin:

I hope you had a safe trip home. As instructed by the court, below please find the 30(b)(6) topics subject to today's order by Special Master Esshaki:

1. Transactional purchase data for the parts at issue
2. Procurement process and supplier selection and price adjustments for the parts at issue, and documents related thereto
3. Vehicle cost data
4. Vehicle pricing process, including process for setting and adjusting pricing, and documents related thereto
5. Transactional sales data for sales of vehicles:
 - a. From OEMs to ADPs and TEDPs
 - b. From OEMs to Distributors
 - c. From Distributors to ADPs and TEDPs;
 - d. From ADPs and TEDPs to EPPs
 - e. From OEMs to EPPs (*e.g.*, fleet buyers)
 - f. From Distributors to EPPs

References above to documents and data include information on format, where maintained, time period, current and legacy systems, and costs and burden of production.

Please share this email with the other OEM counsel. Plaintiffs' counsel, please circulate among your group. We will do same with defendants.

Thanks and have a nice evening.



Adam C. Hemlock

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